

PP:SAE
F. #2025R00215

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

- against -

DIDI ZENG,
also known as “Yun Zeng,” and “Gao Ching,”

Defendant.

COMPLAINT AND
AFFIDAVIT IN SUPPORT
OF AN ARREST WARRANT

(8 U.S.C. § 1326(a) and (b)
(2)) No. 25 MJ 141

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EASTERN DISTRICT OF NEW YORK, SS:

George Chun, being duly sworn, deposes and states that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations (“HSI”), duly appointed according to law and acting as such.

On or about November 14, 2024, within the Eastern District of New York and elsewhere, the defendant DIDI ZENG, also known as “Yun Zeng,” being an alien who had previously been deported and removed from the United States after a conviction for the commission of an aggravated felony, was found in the United States, without the Attorney General of the United States and the Secretary of the Department of Homeland Security having expressly consented to such alien’s applying for admission.

(Title 8, United States Code, Section 1326(a) and (b)(2))

The source of your deponent’s information and the grounds for his belief are as follows:¹

¹ Because the purpose of this Complaint is to set forth only those facts necessary to

1. I am a Special Agent with HSI and have undergone extensive law enforcement and legal training involving Title 8 of the United States Code concerning illegal reentry of aliens into the United States. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file, including the defendant's criminal history record; and from reports of other law enforcement officers involved in the investigation.

2. On or about September 8, 2020, the defendant DIDI ZENG, a native and citizen of China, was ordered removed from the United States by an Immigration Judge at or near Tacoma, Washington after waiving all forms of eligible relief and his right to appeal under the Immigration and Nationality Act. ZENG was released pending an order of Supervision with Alternatives to Detention (GPS ankle monitor).

3. On or about September 22, 2021, the defendant DIDI ZENG, after having been ordered removed from the United States and while his appeals were pending, attempted to commit a gunpoint robbery of a gambling establishment in Flushing, New York along with two other individuals. According to court documents, ZENG, while brandishing a firearm, entered a back office of the establishment and demanded money from an individual. When the victim stated he did not have any money, ZENG hit the victim in the back of the head several times with the firearm. On or about May 13, 2022, ZENG was as arrested for Conspiracy to Commit Hobbs Act Robbery, in violation of 18 U.S.C. § 1951. ZENG was charged under the alias "Yun Zeng." On or about January 26, 2024, ZENG was convicted by plea of guilty of Hobbs Act Robbery Conspiracy in violation of Title 18 U.S.C. § 1951 and other related charges. For that crime,

establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

ZENG was sentenced to 23 months' imprisonment. He was also sentenced to 24 months of post-release supervision. United States v. Zeng, 22-CR-00302 (HG) (E.D.N.Y.).

4. On or about March 11, 2024, the defendant DIDI ZENG was deported to China on a flight from John F. Kennedy International Airport. At the time of his deportation, ZENG was advised he was prohibited from entering, or attempting to enter, or being in the United States, “[a]t any time because you have been found inadmissible or excludable under section 212 of the Act, or deportable under section 241 or 237 of the Act, and ordered deported or removed from the United States, and you have been convicted of a crime designated as an aggravated felony.”

5. On or about November 14, 2024, the defendant DIDI ZENG was arrested by the New York City Police Department (“NYPD”) in Staten Island, New York, for Criminal Possession of a Weapon-Machine Gun, in violation of NYPL § 265.03; Criminal Possession of a Weapon-Five or More Firearms, in violation of PL § 265.03; and other related charges. ZENG told the arresting officers his name was “Gao Ching.” ZENG is currently incarcerated at Rikers Island awaiting trial on these charges.

6. In connection with his arrest on November 14, 2024, the defendant DIDI ZENG's fingerprint impressions were taken. Law enforcement officers compared the fingerprints taken in connection with ZENG's arrest on or about November 14, 2024, to those taken from the defendant in connection with ZENG's January 26, 2024, conviction, and to the fingerprints taken in connection with the defendant's removals and deportations by ICE in 2020 and 2024. All of the above fingerprints were made by one and the same individual.

7. A search of immigration records reveals that there exists no request by the defendant DIDI ZENG for permission from either the Secretary of the Department of Homeland Security or the Attorney General of the United States to reenter the United States after removal.

WHEREFORE, your deponent respectfully requests that the defendant DIDI ZENG be dealt with according to law.

GEORGE J CHUN

Digitally signed by GEORGE J
CHUN
Date: 2025.04.17 10:57:14 -04'00'

George Chun
Special Agent, United States Department of
Homeland Security, Homeland Security
Investigations

Sworn to before me by telephone this
17th day of April, 2025

Marcia M. Henry
THE HONORABLE
UNITED STATES MAGISTRATE JUDGE HENRY
EASTERN DISTRICT OF NEW YORK